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a second well of the second conductivity type formed in the semiconductor material,
the second well being spaced apart from the first well by a gap and having a dopant
concentration;

a third contact region of the first conductivity type formed in the second well;
a fourth contact region of the second conductivity type formed in the second well;
a second trigger region of the second conductivity type formed in the second well, the
second trigger region being spaced apart from the third and fourth contact regions, the second
trigger region not contacting the first conductive structure; and

a second conductive structure formed over and contacting the third and fourth contact
regions, the second conductive structure not contacting the first trigger region.

C²
13. (Amended) The device of claim 8 wherein during a first ESD event, a first
potential on the first conductive structure is greater than a second potential on the second
conductive structure.

14. (Amended) The device of claim 13 wherein during a second ESD event, a
third potential on the second conductive structure is greater than a fourth potential on the first
conductive structure.

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